

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

TINNA SHERMAN,)
)
Plaintiff,)
)
vs.) CASE NO:3:07CV1100
)
OPELIKA AUTO GROUP, INC.,)
)
Defendant.)

**MOTION FOR EXTENSION OF DEADLINE
FOR COMPLETION OF DISCOVERY AND DISPOSITIVE MOTIONS**

COMES NOW the Defendant, Opelika Auto Group, Inc., by and through its counsel, John Martin Galese and Cassandra J. Harris, and respectfully requests this Honorable Court to extend the deadline for completion of discovery and dispositive motions for sixty (60) days. In support hereof, the Defendant submits the following:

1. The current deadline for the completion of discovery and the submission of any dispositive motions is August 4, 2008.
2. The Defendant has attempted to take the deposition of the Plaintiff and has scheduled said deposition on five separate occasions, four of which were cancelled by Plaintiff's counsel.

3. Plaintiff's counsel is unavailable for a deposition prior to the discovery cutoff date of August 4, 2008.
4. The undersigned has contacted Plaintiff's counsel, who does not object to the extension of deadlines.

WHEREFORE, for the foregoing reasons, and with Plaintiff's counsel's consent, the Defendant respectfully requests an Order extending the deadline for completion of discovery and the deadline for submission of any dispositive motions for sixty (60) days.

Respectfully submitted,

/s/ Cassandra J. Harris

John Martin Galese (ASB-5382-E61J)
Cassandra J. Harris (ASB-2841-D52H)

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2008, I electronically filed the above and foregoing pleading with the Clerk of Court, which sends electronic notice to all counsel of record.

/s/ Cassandra J. Harris